

U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York, NY 10007

March 4, 2021

By ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: Rochel Kaufman v. United States of America, No. 21 Civ. 810 (PKC) (S.D.N.Y.)

Dear Judge Castel:

This Office represents the United States of America in the above-referenced medical malpractice action brought by Plaintiff Rochel Kaufman pursuant to the Federal Tort Claims Act. I write respectfully to request an adjournment of the parties' March 25, 2021 initial pretrial conference and the corresponding deadline to submit a proposed case management plan and joint letter to the Court. This is the United States' first request for an adjournment of the initial pretrial conference. Plaintiff consents to this request. The parties propose any date during the week of April 26 or May 3, or any other time convenient to the Court, as alternative dates to hold the conference.

Plaintiff filed this lawsuit on January 29, 2021, and the United States was served on February 22, 2021. Pursuant to Federal Rule of Civil Procedure 12(a)(2), the United States has until April 23, 2021 to answer or otherwise respond to the complaint. The United States respectfully submits that the interest of efficient case management would be served by adjourning the initial pretrial conference until after the United States has responded to the complaint.

I thank the Court for its consideration of this request.

Initial pretrial conference adjourned from March 25, 2021 to May 6, 2021 at 10:30 a.m. The conference will proceed telephonically.

Dial-In No.: 1-888-363-4749,

Access Code: 3667981.

SO ORDERED. Dated: 3/4/2021

Respectfully,

AUDREY STRAUSS United States Attorney for the Southern District of New York

By: /s/Ilan Stein

ILAN STEIN

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P. Kevin Castel United States District Judge